

**EXHIBIT A**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

_____	)	
Sandra E. Levy,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 3:16-cv-00864-JAG
	)	
Pioneer Credit Recovery, Inc.,	)	
	)	
Defendant.	)	
_____	)	

**DEFENDANT PIONEER CREDIT RECOVERY, INC.'S OFFER OF JUDGMENT**

Pursuant to Federal Rule of Civil Procedure 68, Defendant Pioneer Credit Recovery, Inc. ("Pioneer") hereby offers to allow judgment to be entered against it in this action, and in favor of Plaintiff Sandra E. Levy, in the amount of THREE THOUSAND DOLLARS (\$3,000), plus costs then accrued under the Fair Debt Collection Practices Act, in an amount to be determined by the Court.

Plaintiff Sandra E. Levy shall have ten (10) days after service of this offer to serve Pioneer with written notice that the offer is accepted. If the offer is not accepted within the prescribed time limits, it will be deemed withdrawn.

Dated: February 28, 2017

Respectfully submitted,

/s/

Deborah J. Israel (VA Bar No. 32378)  
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*Counsel for Defendant Pioneer Credit Recovery,  
Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 28th day of February, 2017, a true and correct copy of the foregoing was served via email and U.S. mail, First Class, upon the following:

Dale W. Pittman  
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*Counsel for Plaintiff Sandra E. Levy*

/s/

Louis J. Rouleau